From:	Hartung, Daniel
To:	BOEM_AOCSR Leasing and Plans
Cc:	Johnston, David
Subject:	FW: ConocoPhillips NOI and EPA permit authorization
Date:	Friday, March 16, 2012 12:36:23 PM
Attachments:	DP_NOI_rev2.pdf noi_cover.pdf noi_table1_rev2.pdf Waste_Stream_Drill_Ship.pdf Waste_Stream_Jack-up_Rig.pdf Artic GP Coverage_ConocoPhillips Ltr.pdf Figure 1_Devils Paw Prospect.pdf

---

From: Hanh Shaw [mailto:Shaw.Hanh@epa.gov]
Sent: Friday, March 16, 2012 12:23 PM
To: Hartung, Daniel
Subject: ConocoPhillips NOI and EPA permit authorization

Hi Dan,

It was nice chatting with you. As promised, attached are the ConocoPhillips NOIs and EPA's authorization under the Arctic NPDES General Permit (now expired).

I will be in touch in a few weeks to discuss the input we received during the public process for the draft Beaufort and Chukchi Exploration NPDES general permits and agency coordination.

Hanh

Hanh Shaw, Team Lead
NPDES Permits Unit, OWW-130
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
P: 206-553-0171
F: 206-553-0165
shaw.hanh@epa.gov

Permit No.:
AKG280000

ATTACHMENT 1

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

APPLICANT (*Owner/Operator*)				
Owner Name:	ConocoPhillips Alaska, Inc.	Operator Mailing Address:	PO Box 100360	
Telephone Number:	907-265-6417		Anchorage, Alaska 99510-0360	
Operator Name:	ConocoPhillips Alaska, Inc.			
Telephone Number:	907-265-6417			
FACILITY				
Facility Name:	To Be Determined	Facility Mailing Address:	PO Box 100360	
Contact Name:	Bruce St. Pierre		Anchorage, Alaska 99510-0360	
Telephone Number:	907-265-6417			
Beginning Date of Operation:	July 1, 2013	Stationary Facilities	Latitude:	
Expected Duration of Operation:	40 Days Per Well Site		Longitude:	
Facility Type (*check applicable type*)	[X] Jackup [X] Drill Ship [ ] Semisubmersible [X] Other (*specify*): Exact drilling vessel has not been determine at this time.	Mobile Facilities	Initial Latitude:	Center Point: 70° 53'15.054"N (NAD 83)
			Initial Longitude:	Center Point:165° 11'36.296"W (NAD 83)

Submit a site map showing the exact location of facility and discharges associated with the project. Mobile facilities may designate an area where they may be operating and must include a map showing those areas and a description of operations within those areas. If the discharge is within 4000 meters of an environmentally sensitive area indicated by the permit, those areas and their distance from the operation/discharge must be shown on the map.

RECEIVING WATER			
[X] Chuckchi Sea		[ ]	Other (*specify*):
[ ] Beaufort Sea			

Supply confirmation with the U.S. Department of State and NOAA that the discharge is seaward of the inner boundary baseline, if applicable.

LOCATION OF DISCHARGE						
MMS	Lease Number	OCS-Y-2381	ADNR	Lease Number	N/A	
	Block Number	Colbert Area Block 6123		Block Number	N/A	
Range of water depths below mean lower low water (MLLW) in the lease block:		From:	137'	To:	137'	

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Discharges (*check all that apply*)			
[X]	001 Drilling Mud and Cuttings	Water Depth:	30 feet
[X]	002 Deck Drainage	Water Depth:	30 feet
[X]	003 Sanitary Waste	Water Depth:	30 feet
[X]	004 Domestic Waste	Water Depth:	30 feet
[X]	005 Desalination Unit Waste	Water Depth:	30 feet
[X]	006 Blowout Preventer Fluid	Water Depth:	137 feet
[X]	007 Boiler Blowdown (When Applicable)	Water Depth:	30 feet
[X]	008 Fire Control System Test Water	Water Depth:	30 feet
[X]	009 Non-Contact Cooling Water	Water Depth:	30 feet
[X]	010 Uncontaminated Ballast Water	Water Depth:	30 feet
[X]	011 Bilge Water	Water Depth:	30 feet
[X]	012 Excess Cement Slurry	Water Depth:	30 feet
[X]	013 Mud, Cuttings, Cement at Seafloor	Water Depth:	137 feet
[ ]	014 Test Fluid	Water Depth:	

Provide a brief description of the treatment process(es) and disposal practices (e.g., backhauled, reinjected, discharged, etc.) at the facility.

Provide a line drawing that shows flows of discharged waste streams through the facility. Indicate intake sources, operations contributing to the effluent, and treatment units labeled to correspond to the discharges (001 - 014). Construct a flow balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a flow balance cannot be determined, provide a pictorial description of the nature and amount of any sources, and any collection or treatment measures.

Well Information

Well Name:	Devil's Paw-1	Latitude:	70° 52' 22.759" N
Well Number:	1	Longitude:	-165°14'56.208" W
Beginning Drill Date:	July 1, 2013	Hole Diameter or Estimated Total Discharge Volume:	36" diameter at surface, 8.5" at depth.

Drilling Fluid

Category (*check all that apply*)			Group (*check all that apply*)		
	[X]	Water-based		[ ]	Lignosulfonate
	[ ]	Oil-based		[ ]	Lime
	[ ]	Synthetic-based		[ ]	Gyp
	[ ]	Other (*specify*):		[X]	Sea-water
				[X]	Saltwater
				[ ]	Saturated Saltwater
				[X]	Nondispersed (Viscosifier/Polymer)

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Zone of Deposit Request (*applicable to those discharges within state of Alaska waters*)				
Are you requesting a Zone of Deposit from ADEC?	☐	Yes (*continue filling out this section*)	☒	No (*skip this section and proceed to Special Conditions, below*)

THE FOLLOWING INFORMATION MUST BE PROVIDED IF REQUESTING A ZONE OF DEPOSIT. The burden of proof for justifying a zone of deposit through demonstrating compliance with the requirements of 18 AAC 70.210 rests with the applicant.

Distance from shoreline of discharge point (measured at M.L.L.W.):		Average Mud density:	
Depth of discharge (measured at M.L.L.W.):		Flow Rate:	
Orientation of outfall to shoreline (e.g., perpendicular, 45°, parallel):		Total Volume:	
Orientation of outfall to water surface (e.g., perpendicular, 45°, parallel):		Maximum current and direction:	

If possible, provide salinity and temperature data from the receiving water surface to the depth of the discharge port or diffuser.

Mixing Zone Request (*applicable to those discharges within state of Alaska waters*)				
Are you requesting a mixing zone from ADEC?	☐	Yes (*continue filling out this section*)	☒	No (*skip this section and proceed to Special Conditions, below*)

THE FOLLOWING INFORMATION MUST BE PROVIDED IF REQUESTING A MIXING ZONE. The burden of proof for justifying a mixing zone through demonstrating compliance with the requirements of 18 AAC 70.240 through 18 AAC 70.270 rests with the applicant.

Distance from shoreline of discharge point or first port of diffuser (measured at M.L.L.W.):		Length of diffuser:	
Depth of discharge port or diffuser (measured at M.L.L.W.):		Diameter of port(s):	
Orientation of diffuser to shoreline (e.g., perpendicular, 45°, parallel):		Number of ports:	
Maximum current:		Port spacing:	

USES OF RECEIVING WATER AT DISTANCE FROM DIFFUSER i.e. Supply for drinking water, Supply for agriculture including irrigation & stock water, Supply for aquaculture, Supply for industrial use, Contact recreation, Secondary recreation, Fish spawning, Harvesting and consumption of raw fish, or other aquatic life (Not needed if not requesting a mixing zone from ADEC):

If possible, provide salinity and temperature data from the receiving water surface to the depth of the discharge port or diffuser.

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Special Conditions (*provide justification for all that are not required, completed or provided*)					
Special Monitoring	☐	Required	☒	Not Required	Justification:
Exploration Plans	☐	Attached	☒	Not Provided	Justification: Submit to BOEMRE
Biological Survey(s)	☐	Attached	☒	Not Provided	Justification: None required
Environmental Report(s)	☐	Attached	☒	Not Provided	Justification: Submit to BOEMRE as part of Exploration Plan
Drilling Fluid Plan	☐	Complete	☒	Not Complete	Justification: Submit to BOEMRE as part of Exploration Plan

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:	B St. Pierre	Date:	4-15-11
Printed Name:	Bruce St. Pierre	Title:	Senior Environmental Coordinator

Mail Completed NOI to EPA and ADEC at the following addresses:

US EPA 1200 6th Avenue, M/S OWW-130 Seattle, WA 98101	ADEC, Water Division 555 Cordova Street Anchorage, Alaska 99501

ATTACHMENT 1

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

APPLICANT (*Owner/Operator*)			
Owner Name:	ConocoPhillips Alaska, Inc.	Operator Mailing Address:	PO Box 100360
Telephone Number:	907-265-6417		Anchorage, Alaska 99510-0360
Operator Name:	ConocoPhillips Alaska, Inc.		
Telephone Number:	907-265-6417		

FACILITY				
Facility Name:	To Be Determined	Facility Mailing Address:	PO Box 100360	
Contact Name:	Bruce St. Pierre		Anchorage, Alaska 99510-0360	
Telephone Number:	907-265-6417			
Beginning Date of Operation:	July 1, 2013	Stationary Facilities	Latitude:	
Expected Duration of Operation:	40 Days Per Well Site		Longitude:	
Facility Type (*check applicable type*)	[X] Jackup [X] Drill Ship [ ] Semisubmersible [X] Other (*specify*): Exact drilling vessel has not been determined at this time.	Mobile Facilities	Initial Latitude:	Center Point: 70° 55'50.313"N (NAD 83)
			Initial Longitude:	Center Point:165° 3'43.939"W (NAD 83)

Submit a site map showing the exact location of facility and discharges associated with the project. Mobile facilities may designate an area where they may be operating and must include a map showing those areas and a description of operations within those areas. If the discharge is within 4000 meters of an environmentally sensitive area indicated by the permit, those areas and their distance from the operation/discharge must be shown on the map.

RECEIVING WATER			
[X]	Chuckchi Sea	[ ]	Other (*specify*):
[ ]	Beaufort Sea		

Supply confirmation with the U.S. Department of State and NOAA that the discharge is seaward of the inner boundary baseline, if applicable.

LOCATION OF DISCHARGE						
MMS	Lease Number	OCS-Y-2374	ADNR	Lease Number	N/A	
	Block Number	Colbert Area Block 6074		Block Number	N/A	
Range of water depths below mean lower low water (MLLW) in the lease block:		From:	132'	To:	132'	

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Discharges (*check all that apply*)			
[X]	001 Drilling Mud and Cuttings	Water Depth:	30 feet
[X]	002 Deck Drainage	Water Depth:	30 feet
[X]	003 Sanitary Waste	Water Depth:	30 feet
[X]	004 Domestic Waste	Water Depth:	30 feet
[X]	005 Desalination Unit Waste	Water Depth:	30 feet
[X]	006 Blowout Preventer Fluid	Water Depth:	132 feet
[X]	007 Boiler Blowdown (When Applicable)	Water Depth:	30 feet
[X]	008 Fire Control System Test Water	Water Depth:	30 feet
[X]	009 Non-Contact Cooling Water	Water Depth:	30 feet
[X]	010 Uncontaminated Ballast Water	Water Depth:	30 feet
[X]	011 Bilge Water	Water Depth:	30 feet
[X]	012 Excess Cement Slurry	Water Depth:	30 feet
[X]	013 Mud, Cuttings, Cement at Seafloor	Water Depth:	132 feet
[ ]	014 Test Fluid	Water Depth:	

Provide a brief description of the treatment process(es) and disposal practices (e.g., backhauled, reinjected, discharged, etc.) at the facility.

Provide a line drawing that shows flows of discharged waste streams through the facility. Indicate intake sources, operations contributing to the effluent, and treatment units labeled to correspond to the discharges (001 - 014). Construct a flow balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a flow balance cannot be determined, provide a pictorial description of the nature and amount of any sources, and any collection or treatment measures.

Well Information			
Well Name:	Devil's Paw-2	Latitude:	70° 55' 51.410" N
Well Number:	2	Longitude:	-165° 02'46.065" W
Beginning Drill Date:	July 1, 2013	Hole Diameter or Estimated Total Discharge Volume:	36" diameter at surface, 8.5" at depth

Drilling Fluid

Category (*check all that apply*)			Group (*check all that apply*)		
	[X]	Water-based		[ ]	Lignosulfonate
	[ ]	Oil-based		[ ]	Lime
	[ ]	Synthetic-based		[ ]	Gyp
	[ ]	Other (*specify*):		[X]	Sea-water
				[X]	Saltwater
				[ ]	Saturated Saltwater
				[X]	Nondispersed (Viscosifier/Polymer)

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Zone of Deposit Request (*applicable to those discharges within state of Alaska waters*)				
Are you requesting a Zone of Deposit from ADEC?	☐	Yes (*continue filling out this section*)	☒	No (*skip this section and proceed to Special Conditions, below*)

THE FOLLOWING INFORMATION MUST BE PROVIDED IF REQUESTING A ZONE OF DEPOSIT. The burden of proof for justifying a zone of deposit through demonstrating compliance with the requirements of 18 AAC 70.210 rests with the applicant.

Distance from shoreline of discharge point (measured at M.L.L.W.):		Average Mud density:	
Depth of discharge (measured at M.L.L.W.):		Flow Rate:	
Orientation of outfall to shoreline (e.g., perpendicular, 45°, parallel):		Total Volume:	
Orientation of outfall to water surface (e.g., perpendicular, 45°, parallel):		Maximum current and direction:	

If possible, provide salinity and temperature data from the receiving water surface to the depth of the discharge port or diffuser.

Mixing Zone Request (*applicable to those discharges within state of Alaska waters*)				
Are you requesting a mixing zone from ADEC?	☐	Yes (*continue filling out this section*)	☒	No (*skip this section and proceed to Special Conditions, below*)

THE FOLLOWING INFORMATION MUST BE PROVIDED IF REQUESTING A MIXING ZONE. The burden of proof for justifying a mixing zone through demonstrating compliance with the requirements of 18 AAC 70.240 through 18 AAC 70.270 rests with the applicant.

Distance from shoreline of discharge point or first port of diffuser (measured at M.L.L.W.):		Length of diffuser:	
Depth of discharge port or diffuser (measured at M.L.L.W.):		Diameter of port(s):	
Orientation of diffuser to shoreline (e.g., perpendicular, 45°, parallel):		Number of ports:	
Maximum current:		Port spacing:	

USES OF RECEIVING WATER AT DISTANCE FROM DIFFUSER i.e. Supply for drinking water, Supply for agriculture including irrigation & stock water, Supply for aquaculture, Supply for industrial use, Contact recreation, Secondary recreation, Fish spawning, Harvesting and consumption of raw fish, or other aquatic life (Not needed if not requesting a mixing zone from ADEC):

If possible, provide salinity and temperature data from the receiving water surface to the depth of the discharge port or diffuser.

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Special Conditions (*provide justification for all that are not required, completed or provided*)					
Special Monitoring	☐	Required	☒	Not Required	Justification:
Exploration Plans	☐	Attached	☒	Not Provided	Justification: Submit to BOEMRE
Biological Survey(s)	☐	Attached	☒	Not Provided	Justification: None required
Environmental Report(s)	☐	Attached	☒	Not Provided	Justification: Submit to BOEMRE as part of Exploration Plan
Drilling Fluid Plan	☐	Complete	☒	Not Complete	Justification: Submit to BOEMRE as part of Exploration Plan

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:	B St Pierre	Date:	4-15-11
Printed Name:	Bruce St. Pierre	Title:	Senior Environmental Coordinator

Mail Completed NOI to EPA and ADEC at the following addresses:

US EPA 1200 6th Avenue, M/S OWW-130 Seattle, WA 98101	ADEC, Water Division 555 Cordova Street Anchorage, Alaska 99501

ATTACHMENT 1

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

APPLICANT (*Owner/Operator*)			
Owner Name:	ConocoPhillips Alaska, Inc.	Operator Mailing Address:	PO Box 100360
Telephone Number:	907-265-6417		Anchorage, Alaska 99510-0360
Operator Name:	ConocoPhillips Alaska, Inc.		
Telephone Number:	907-265-6417		

FACILITY					
Facility Name:	To Be Determined	Facility Mailing Address:	PO Box 100360		
Contact Name:	Bruce St. Pierre		Anchorage, Alaska 99510-0360		
Telephone Number:	907-265-6417				
Beginning Date of Operation:	July 1, 2013	Stationary Facilities	Latitude:		
Expected Duration of Operation:	40 Days Per Well Site		Longitude:		
Facility Type (*check applicable type*)	[X] Jackup [X] Drill Ship [ ] Semisubmersible [X] Other (*specify*): Exact drilling vessel has not been determined at this time.	Mobile Facilities	Initial Latitude:	Center Point: 70° 58'24.916"N (NAD 83)	
			Initial Longitude:	Center Point: 165° 11'39.326"W (NAD 83)	

Submit a site map showing the exact location of facility and discharges associated with the project. Mobile facilities may designate an area where they may be operating and must include a map showing those areas and a description of operations within those areas. If the discharge is within 4000 meters of an environmentally sensitive area indicated by the permit, those areas and their distance from the operation/discharge must be shown on the map.

RECEIVING WATER			
[X]	Chuckchi Sea	[ ]	Other (*specify*):
[ ]	Beaufort Sea		

Supply confirmation with the U.S. Department of State and NOAA that the discharge is seaward of the inner boundary baseline, if applicable.

LOCATION OF DISCHARGE						
MMS	Lease Number	OCS-Y-2360	ADNR	Lease Number	N/A	
	Block Number	Colbert Area Block 6023		Block Number	N/A	
Range of water depths below mean lower low water (MLLW) in the lease block:		From:	133'	To:	133'	

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Discharges (*check all that apply*)			
[X]	001 Drilling Mud and Cuttings	Water Depth:	30 feet
[X]	002 Deck Drainage	Water Depth:	30 feet
[X]	003 Sanitary Waste	Water Depth:	30 feet
[X]	004 Domestic Waste	Water Depth:	30 feet
[X]	005 Desalination Unit Waste	Water Depth:	30 feet
[X]	006 Blowout Preventer Fluid	Water Depth:	133feet
[X]	007 Boiler Blowdown (When Applicable)	Water Depth:	30 feet
[X]	008 Fire Control System Test Water	Water Depth:	30 feet
[X]	009 Non-Contact Cooling Water	Water Depth:	30 feet
[X]	010 Uncontaminated Ballast Water	Water Depth:	30 feet
[X]	011 Bilge Water	Water Depth:	30 feet
[X]	012 Excess Cement Slurry	Water Depth:	30 feet
[X]	013 Mud, Cuttings, Cement at Seafloor	Water Depth:	133feet
[ ]	014 Test Fluid	Water Depth:	

Provide a brief description of the treatment process(es) and disposal practices (e.g., backhauled, reinjected, discharged, etc.) at the facility.

Provide a line drawing that shows flows of discharged waste streams through the facility. Indicate intake sources, operations contributing to the effluent, and treatment units labeled to correspond to the discharges (001 - 014). Construct a flow balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a flow balance cannot be determined, provide a pictorial description of the nature and amount of any sources, and any collection or treatment measures.

Well Information			
Well Name:	Devil's Paw-3	Latitude:	70° 59' 09.611" N
Well Number:	3	Longitude:	-165° 14' 24.970"W
Beginning Drill Date:	July 1, 2013	Hole Diameter or Estimated Total Discharge Volume:	36" diameter at surface, 8.5" at depth

Drilling Fluid

Category (*check all that apply*)			Group (*check all that apply*)		
	[X]	Water-based		[ ]	Lignosulfonate
	[ ]	Oil-based		[ ]	Lime
	[ ]	Synthetic-based		[ ]	Gyp
	[ ]	Other (*specify*):		[X]	Sea-water
				[X]	Saltwater
				[ ]	Saturated Saltwater
				[X]	Nondispersed (Viscosifier/Polymer)

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Zone of Deposit Request (*applicable to those discharges within state of Alaska waters*)				
Are you requesting a Zone of Deposit from ADEC?	☐	Yes (*continue filling out this section*)	☒	No (*skip this section and proceed to Special Conditions, below*)

THE FOLLOWING INFORMATION MUST BE PROVIDED IF REQUESTING A ZONE OF DEPOSIT. The burden of proof for justifying a zone of deposit through demonstrating compliance with the requirements of 18 AAC 70.210 rests with the applicant.

Distance from shoreline of discharge point (measured at M.L.L.W.):		Average Mud density:	
Depth of discharge (measured at M.L.L.W.):		Flow Rate:	
Orientation of outfall to shoreline (e.g., perpendicular, 45°, parallel):		Total Volume:	
Orientation of outfall to water surface (e.g., perpendicular, 45°, parallel):		Maximum current and direction:	

If possible, provide salinity and temperature data from the receiving water surface to the depth of the discharge port or diffuser.

Mixing Zone Request (*applicable to those discharges within state of Alaska waters*)				
Are you requesting a mixing zone from ADEC?	☐	Yes (*continue filling out this section*)	☒	No (*skip this section and proceed to Special Conditions, below*)

THE FOLLOWING INFORMATION MUST BE PROVIDED IF REQUESTING A MIXING ZONE. The burden of proof for justifying a mixing zone through demonstrating compliance with the requirements of 18 AAC 70.240 through 18 AAC 70.270 rests with the applicant.

Distance from shoreline of discharge point or first port of diffuser (measured at M.L.L.W.):		Length of diffuser:	
Depth of discharge port or diffuser (measured at M.L.L.W.):		Diameter of port(s):	
Orientation of diffuser to shoreline (e.g., perpendicular, 45°, parallel):		Number of ports:	
Maximum current:		Port spacing:	

USES OF RECEIVING WATER AT DISTANCE FROM DIFFUSER i.e. Supply for drinking water, Supply for agriculture including irrigation & stock water, Supply for aquaculture, Supply for industrial use, Contact recreation, Secondary recreation, Fish spawning, Harvesting and consumption of raw fish, or other aquatic life (Not needed if not requesting a mixing zone from ADEC):

If possible, provide salinity and temperature data from the receiving water surface to the depth of the discharge port or diffuser.

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Special Conditions (*provide justification for all that are not required, completed or provided*)					
Special Monitoring	☐	Required	☒	Not Required	Justification:
Exploration Plans	☐	Attached	☒	Not Provided	Justification: Submit to the BOEMRE
Biological Survey(s)	☐	Attached	☒	Not Provided	Justification: None required
Environmental Report(s)	☐	Attached	☒	Not Provided	Justification: Submit to BOEMRE as part of Exploration Plan
Drilling Fluid Plan	☐	Complete	☒	Not Complete	Justification: Submit to BOEMRE as part of Exploration Plan

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:	B St Pierre	Date:	4-15-11
Printed Name:	Bruce St. Pierre	Title:	Senior Environmental Coordinator

Mail Completed NOI to EPA and ADEC at the following addresses:

US EPA 1200 6th Avenue, M/S OWW-130 Seattle, WA 98101	ADEC, Water Division 555 Cordova Street Anchorage, Alaska 99501

Permit No.:
AKG280000

ATTACHMENT 1

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

APPLICANT (*Owner/Operator*)				
Owner Name:	ConocoPhillips Alaska, Inc.	Operator Mailing Address:	PO Box 100360	
Telephone Number:	907-265-6417		Anchorage, Alaska 99510-0360	
Operator Name:	ConocoPhillips Alaska, Inc.			
Telephone Number:	907-265-6417			
FACILITY				
Facility Name:	To Be Determined	Facility Mailing Address:	PO Box 100360	
Contact Name:	Bruce St. Pierre		Anchorage, Alaska 99510-0360	
Telephone Number:	907-265-6417			
Beginning Date of Operation:	July 1, 2013	Stationary Facilities	Latitude:	
Expected Duration of Operation:	40 Days Per Well Site		Longitude:	
Facility Type (*check applicable type*)	[X] Jackup [X] Drill Ship [ ] Semisubmersible [X] Other (*specify*): Exact drilling vessel has not been determine at this time.	Mobile Facilities	Initial Latitude:	Center Point: 70° 48'2.211"N (NAD 83)
			Initial Longitude:	Center Point:165° 35'5.642"W (NAD 83)
Submit a site map showing the exact location of facility and discharges associated with the project. Mobile facilities may designate an area where they may be operating and must include a map showing those areas and a description of operations within those areas. If the discharge is within 4000 meters of an environmentally sensitive area indicated by the permit, those areas and their distance from the operation/discharge must be shown on the map.				
RECEIVING WATER				
[X] Chuckchi Sea [ ] Beaufort Sea		[ ] Other (*specify*):		
Supply confirmation with the U.S. Department of State and NOAA that the discharge is seaward of the inner boundary baseline, if applicable.				
LOCATION OF DISCHARGE				
MMS	Lease Number: OCS-Y-2394 Block Number: Colbert Area Block 6220	ADNR	Lease Number: N/A Block Number: N/A	
Range of water depths below mean lower low water (MLLW) in the lease block:	From: 138'	To: 138'		

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Discharges (*check all that apply*)			
[X]	001 Drilling Mud and Cuttings	Water Depth:	30 feet
[X]	002 Deck Drainage	Water Depth:	30 feet
[X]	003 Sanitary Waste	Water Depth:	30 feet
[X]	004 Domestic Waste	Water Depth:	30 feet
[X]	005 Desalination Unit Waste	Water Depth:	30 feet
[X]	006 Blowout Preventer Fluid	Water Depth:	138 feet
[X]	007 Boiler Blowdown (When Applicable)	Water Depth:	30 feet
[X]	008 Fire Control System Test Water	Water Depth:	30 feet
[X]	009 Non-Contact Cooling Water	Water Depth:	30 feet
[X]	010 Uncontaminated Ballast Water	Water Depth:	30 feet
[X]	011 Bilge Water	Water Depth:	30 feet
[X]	012 Excess Cement Slurry	Water Depth:	30 feet
[X]	013 Mud, Cuttings, Cement at Seafloor	Water Depth:	138 feet
[ ]	014 Test Fluid	Water Depth:	

Provide a brief description of the treatment process(es) and disposal practices (e.g., backhauled, reinjected, discharged, etc.) at the facility.

Provide a line drawing that shows flows of discharged waste streams through the facility. Indicate intake sources, operations contributing to the effluent, and treatment units labeled to correspond to the discharges (001 - 014). Construct a flow balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a flow balance cannot be determined, provide a pictorial description of the nature and amount of any sources, and any collection or treatment measures.

Well Information

Well Name:	Devil's Paw-4	Latitude:	70° 48' 46.314" N
Well Number:	4	Longitude:	-165° 37'35.246" W
Beginning Drill Date:	July 1, 2013	Hole Diameter or Estimated Total Discharge Volume:	36" diameter at surface, 8.5" at depth

Drilling Fluid

Category (*check all that apply*)			Group (*check all that apply*)		
	[X]	Water-based		[ ]	Lignosulfonate
	[ ]	Oil-based		[ ]	Lime
	[ ]	Synthetic-based		[ ]	Gyp
	[ ]	Other (*specify*):		[X]	Sea-water
				[X]	Saltwater
				[ ]	Saturated Saltwater
				[X]	Nondispersed (Viscosifier/Polymer)

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Zone of Deposit Request (*applicable to those discharges within state of Alaska waters*)				
Are you requesting a Zone of Deposit from ADEC?	☐	Yes (*continue filling out this section*)	☒	No (*skip this section and proceed to Special Conditions, below*)

THE FOLLOWING INFORMATION MUST BE PROVIDED IF REQUESTING A ZONE OF DEPOSIT. The burden of proof for justifying a zone of deposit through demonstrating compliance with the requirements of 18 AAC 70.210 rests with the applicant.

Distance from shoreline of discharge point (measured at M.L.L.W.):		Average Mud density:	
Depth of discharge (measured at M.L.L.W.):		Flow Rate:	
Orientation of outfall to shoreline (e.g., perpendicular, 45°, parallel):		Total Volume:	
Orientation of outfall to water surface (e.g., perpendicular, 45°, parallel):		Maximum current and direction:	

If possible, provide salinity and temperature data from the receiving water surface to the depth of the discharge port or diffuser.

Mixing Zone Request (*applicable to those discharges within state of Alaska waters*)				
Are you requesting a mixing zone from ADEC?	☐	Yes (*continue filling out this section*)	☒	No (*skip this section and proceed to Special Conditions, below*)

THE FOLLOWING INFORMATION MUST BE PROVIDED IF REQUESTING A MIXING ZONE. The burden of proof for justifying a mixing zone through demonstrating compliance with the requirements of 18 AAC 70.240 through 18 AAC 70.270 rests with the applicant.

Distance from shoreline of discharge point or first port of diffuser (measured at M.L.L.W.):		Length of diffuser:	
Depth of discharge port or diffuser (measured at M.L.L.W.):		Diameter of port(s):	
Orientation of diffuser to shoreline (e.g., perpendicular, 45°, parallel):		Number of ports:	
Maximum current:		Port spacing:	

USES OF RECEIVING WATER AT DISTANCE FROM DIFFUSER i.e. Supply for drinking water, Supply for agriculture including irrigation & stock water, Supply for aquaculture, Supply for industrial use, Contact recreation, Secondary recreation, Fish spawning, Harvesting and consumption of raw fish, or other aquatic life (Not needed if not requesting a mixing zone from ADEC):

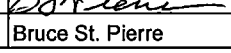
If possible, provide salinity and temperature data from the receiving water surface to the depth of the discharge port or diffuser.

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Special Conditions (*provide justification for all that are not required, completed or provided*)					
Special Monitoring	☐	Required	☒	Not Required	Justification:
Exploration Plans	☐	Attached	☒	Not Provided	Justification: Submit to BOEMRE
Biological Survey(s)	☐	Attached	☒	Not Provided	Justification: None required
Environmental Report(s)	☐	Attached	☒	Not Provided	Justification: Submit to BOEMRE as part of Exploration Plan
Drilling Fluid Plan	☐	Complete	☒	Not Complete	Justification: Submit to BOEMRE as part of Exploration Plan

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:		Date:	4-15-11
Printed Name:	Bruce St. Pierre	Title:	Senior Environmental Coordinator

Mail Completed NOI to EPA and ADEC at the following addresses:

US EPA 1200 6th Avenue, M/S OWW-130 Seattle, WA 98101	ADEC, Water Division 555 Cordova Street Anchorage, Alaska 99501

ATTACHMENT 1

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

APPLICANT (*Owner/Operator*)			
Owner Name:	ConocoPhillips Alaska, Inc.	Operator Mailing Address:	PO Box 100360
Telephone Number:	907-265-6417		Anchorage, Alaska 99510-0360
Operator Name:	ConocoPhillips Alaska, Inc.		
Telephone Number:	907-265-6417		

FACILITY				
Facility Name:	To Be Determined	Facility Mailing Address:	PO Box 100360	
Contact Name:	Bruce St. Pierre		Anchorage, Alaska 99510-0360	
Telephone Number:	907-265-6417			
Beginning Date of Operation:	July 1, 2013	Stationary Facilities	Latitude:	
Expected Duration of Operation:	40 Days Per Well Site		Longitude:	
Facility Type (*check applicable type*)	[X] Jackup [X] Drill Ship [ ] Semisubmersible [X] Other (*specify*): Exact drilling vessel has not been determined at this time.	Mobile Facilities	Initial Latitude:	Center Point: 70° 55'49.986"N (NAD 83)
			Initial Longitude:	Center Point: 165° 11'37.808"W (NAD 83)

Submit a site map showing the exact location of facility and discharges associated with the project. Mobile facilities may designate an area where they may be operating and must include a map showing those areas and a description of operations within those areas. If the discharge is within 4000 meters of an environmentally sensitive area indicated by the permit, those areas and their distance from the operation/discharge must be shown on the map.

RECEIVING WATER			
[X]	Chuckchi Sea	[ ]	Other (*specify*):
[ ]	Beaufort Sea		

Supply confirmation with the U.S. Department of State and NOAA that the discharge is seaward of the inner boundary baseline, if applicable.

LOCATION OF DISCHARGE						
MMS	Lease Number	OCS-Y-2373	ADNR	Lease Number	N/A	
	Block Number	Colbert Area Block 6073		Block Number	N/A	
Range of water depths below mean lower low water (MLLW) in the lease block:		From:	136'	To:	136	

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Discharges (*check all that apply*)			
[X]	001 Drilling Mud and Cuttings	Water Depth:	30 feet
[X]	002 Deck Drainage	Water Depth:	30 feet
[X]	003 Sanitary Waste	Water Depth:	30 feet
[X]	004 Domestic Waste	Water Depth:	30 feet
[X]	005 Desalination Unit Waste	Water Depth:	30 feet
[X]	006 Blowout Preventer Fluid	Water Depth:	136 feet
[X]	007 Boiler Blowdown (When Applicable)	Water Depth:	30 feet
[X]	008 Fire Control System Test Water	Water Depth:	30 feet
[X]	009 Non-Contact Cooling Water	Water Depth:	30 feet
[X]	010 Uncontaminated Ballast Water	Water Depth:	30 feet
[X]	011 Bilge Water	Water Depth:	30 feet
[X]	012 Excess Cement Slurry	Water Depth:	30 feet
[X]	013 Mud, Cuttings, Cement at Seafloor	Water Depth:	136 feet
[ ]	014 Test Fluid	Water Depth:	

Provide a brief description of the treatment process(es) and disposal practices (e.g., backhauled, reinjected, discharged, etc.) at the facility.

Provide a line drawing that shows flows of discharged waste streams through the facility. Indicate intake sources, operations contributing to the effluent, and treatment units labeled to correspond to the discharges (001 - 014). Construct a flow balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a flow balance cannot be determined, provide a pictorial description of the nature and amount of any sources, and any collection or treatment measures.

Well Information

Well Name:	Devil's Paw-5	Latitude:	70° 54' 57.911" N
Well Number:	5	Longitude:	-165° 13' 51.464"W
Beginning Drill Date:	July 1, 2013	Hole Diameter or Estimated Total Discharge Volume:	36" diameter at surface, 8.5" at depth

Drilling Fluid

Category (*check all that apply*)			Group (*check all that apply*)		
	[X]	Water-based		[ ]	Lignosulfonate
	[ ]	Oil-based		[ ]	Lime
	[ ]	Synthetic-based		[ ]	Gyp
	[ ]	Other (*specify*):		[X]	Sea-water
				[X]	Saltwater
				[ ]	Saturated Saltwater
				[X]	Nondispersed (Viscosifier/Polymer)

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Zone of Deposit Request (*applicable to those discharges within state of Alaska waters*)				
Are you requesting a Zone of Deposit from ADEC?	☐	Yes (*continue filling out this section*)	☒	No (*skip this section and proceed to Special Conditions, below*)

THE FOLLOWING INFORMATION MUST BE PROVIDED IF REQUESTING A ZONE OF DEPOSIT. The burden of proof for justifying a zone of deposit through demonstrating compliance with the requirements of 18 AAC 70.210 rests with the applicant.

Distance from shoreline of discharge point (measured at M.L.L.W.):		Average Mud density:	
Depth of discharge (measured at M.L.L.W.):		Flow Rate:	
Orientation of outfall to shoreline (e.g., perpendicular, 45°, parallel):		Total Volume:	
Orientation of outfall to water surface (e.g., perpendicular, 45°, parallel):		Maximum current and direction:	

If possible, provide salinity and temperature data from the receiving water surface to the depth of the discharge port or diffuser.

Mixing Zone Request (*applicable to those discharges within state of Alaska waters*)				
Are you requesting a mixing zone from ADEC?	☐	Yes (*continue filling out this section*)	☒	No (*skip this section and proceed to Special Conditions, below*)

THE FOLLOWING INFORMATION MUST BE PROVIDED IF REQUESTING A MIXING ZONE. The burden of proof for justifying a mixing zone through demonstrating compliance with the requirements of 18 AAC 70.240 through 18 AAC 70.270 rests with the applicant.

Distance from shoreline of discharge point or first port of diffuser (measured at M.L.L.W.):		Length of diffuser:	
Depth of discharge port or diffuser (measured at M.L.L.W.):		Diameter of port(s):	
Orientation of diffuser to shoreline (e.g., perpendicular, 45°, parallel):		Number of ports:	
Maximum current:		Port spacing:	

USES OF RECEIVING WATER AT DISTANCE FROM DIFFUSER i.e. Supply for drinking water, Supply for agriculture including irrigation & stock water, Supply for aquaculture, Supply for industrial use, Contact recreation, Secondary recreation, Fish spawning, Harvesting and consumption of raw fish, or other aquatic life (Not needed if not requesting a mixing zone from ADEC):

If possible, provide salinity and temperature data from the receiving water surface to the depth of the discharge port or diffuser.

NOTICE OF INTENT (NOI) INFORMATION SHEET
NPDES GENERAL PERMIT AKG280000
OIL AND GAS EXPLORATION FACILITIES
ON THE OUTER CONTINENTAL SHELF AND CONTIGUOUS STATE WATERS

Special Conditions (*provide justification for all that are not required, completed or provided*)					
Special Monitoring	☐	Required	☒	Not Required	Justification:
Exploration Plans	☐	Attached	☒	Not Provided	Justification: Submit to the BOEMRE
Biological Survey(s)	☐	Attached	☒	Not Provided	Justification: None required
Environmental Report(s)	☐	Attached	☒	Not Provided	Justification: Submit to BOEMRE as part of Exploration Plan
Drilling Fluid Plan	☐	Complete	☒	Not Complete	Justification: Submit to BOEMRE as part of Exploration Plan

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:	B St Pierre	Date:	4-15-11
Printed Name:	Bruce St. Pierre	Title:	Senior Environmental Coordinator

Mail Completed NOI to EPA and ADEC at the following addresses:

US EPA 1200 6th Avenue, M/S OWW-130 Seattle, WA 98101	ADEC, Water Division 555 Cordova Street Anchorage, Alaska 99501

Bruce St. Pierre, Jr.
Senior Environmental Coordinator
ConocoPhillips Alaska
700 G Street, ATO 1966
P.O. Box 100360
Anchorage, AK 99510-0360

Phone: (907) 265-6417
Fax: (907) 263-4966
Email:
Bruce.St.Pierre@conocophillips.com

April 14, 2011

Ms. Hanh Shaw
U.S. Environmental Protection Agency
1200 6th Ave. M/S OWW-130
Seattle, WA 98101

Certified Mail Return Receipt

Re: Filing of Notices of Intent (NOI) - REVISED – NPDES General Permit AK280000
ConocoPhillips, Chukchi Sea Exploration Program

Dear Ms. Shaw,

ConocoPhillips Company (COP) hereby submits five Notices of Intent for discharge under the current NPDES General Permit AK280000. COP acquired leases under the Chukchi 193 Lease Sale in February of 2008. We are currently progressing planning documents and permit applications for an exploration program during the summer of 2013.

Per our discussions, some of the discharges under category 001 have been moved to category 013 if they are discharged at the seafloor. The volume for drilling cuttings listed in category 001 is based on historical volumes from similar operations. This volume is not the theoretical gage volume which is based on the well geometry. The 8,585 barrels is based on empirical expansion and washout factors that increase the actual volume of cuttings. The cement volumes listed in discharge category 012 are inclusive of cement, cement spacers and wash-up from the cement unit.

With respect to the volume listed under discharge 010, there is approximately 33,400 barrels of seawater used to fill clean rig tanks to set the legs firmly on the seafloor. This volume is then discharged back to the sea. It is not truly ballast water, but fits best into that category.

Attached are the revised NOI forms, a regional map (Figure 1), a discharge listing (Table 1), and flow diagrams for two scenarios.

Please do not hesitate to contact me by phone at (907) 265-6417 or via email at Bruce.St.Pierre@conocophillips.com if you have any questions or require additional information.

Best Regards,

Bruce St. Pierre
Senior Environmental Coordinator

Bws:
Attachments

Cc: ADEC, Water Division, 555 Cordova St., Anchorage, AK 99501

Table 1: ConocoPhillips Devil's Paw Types and Projected Wastes and Volume of Ocean Discharges During the Drilling Season

The following table lists the types of wastes, expected quantities, and rates of discharge that are expected to be generated during the offshore exploration drilling program at the Devil's Paw Prospect and discharged into the sea. This information is being submitted to the Environmental Protection Agency (EPA) to support a Notice of Intent (NOI) application for authorization to discharge the wastes under National Pollutant Discharge Elimination System (NPDES) General Permit AKG-28-0000.

Waste AKG280000 Discharge Number / Rig Type	Waste Name	Waste composition	Estimated Volume	Estimated Rate of Discharge	Method of determination	Treating, Storing, and Downhole Disposal	Discharge Method
001							
Applicable to both Jack-up Rig or Drill Ship	Drill cuttings generated from +/- 300' to well total depth	Drilled formation rock/water-based drilling mud	8,585 bbls (per well)	Less than 200 bbls/hr for all hole sections below structural casing	Used empirical expansion and washout factors to convert drilled gage hole size to cuttings volume. Gage hole volume is about 30% of the actual volume.	Drill cuttings from the remainder of the well would not normally be stored or disposed of downhole. They would be treated by the rig's solids control system to remove and recycle as much liquid mud as possible. The cuttings would be tested for sheen before being discharged overboard. Cuttings not passing the sheen test would be boxed in liquid tight containers to be disposed of at an approved site.	Added to cooling water discharge stream and discharged through downcomer.
Applicable to both Jack-up Rig or Drill Ship	Water based Drilling Mud	Drilling Mud	800 bbls (per well)	700 bbls/hr	Historic bulk discharge volumes modified for hole size, pit volume, P&A practices, mud systems	There would be occasional discharges of whole mud that have been tested for sheen. Drilling fluids that do not pass the sheen test would be held until transported in bulk or in liquid tight containers to an approved disposal site. At the end of the well excess drilling mud would be disposed of down hole prior to well abandonment.	Added to cooling water discharge stream and discharged through downcomer.
002							
Applicable to both Jack-up Rig or Drill Ship	Deck Drainage	Rain water/snow fall	3,400 bbls/100-day drill season	As accumulated	Rig's flat horizontal surface area times average rain and snow fall for the days on location	Deck drainage would be directed to the oil/water separator and the associated clean water holding tank. At intermittent intervals the separated water would be tested for sheen and discharged to the ocean.	Added to cooling water discharge stream and discharged through downcomer.

Table 1: ConocoPhillips Devil's Paw Types and Projected Wastes and Volume of Ocean Discharges During the Drilling Season

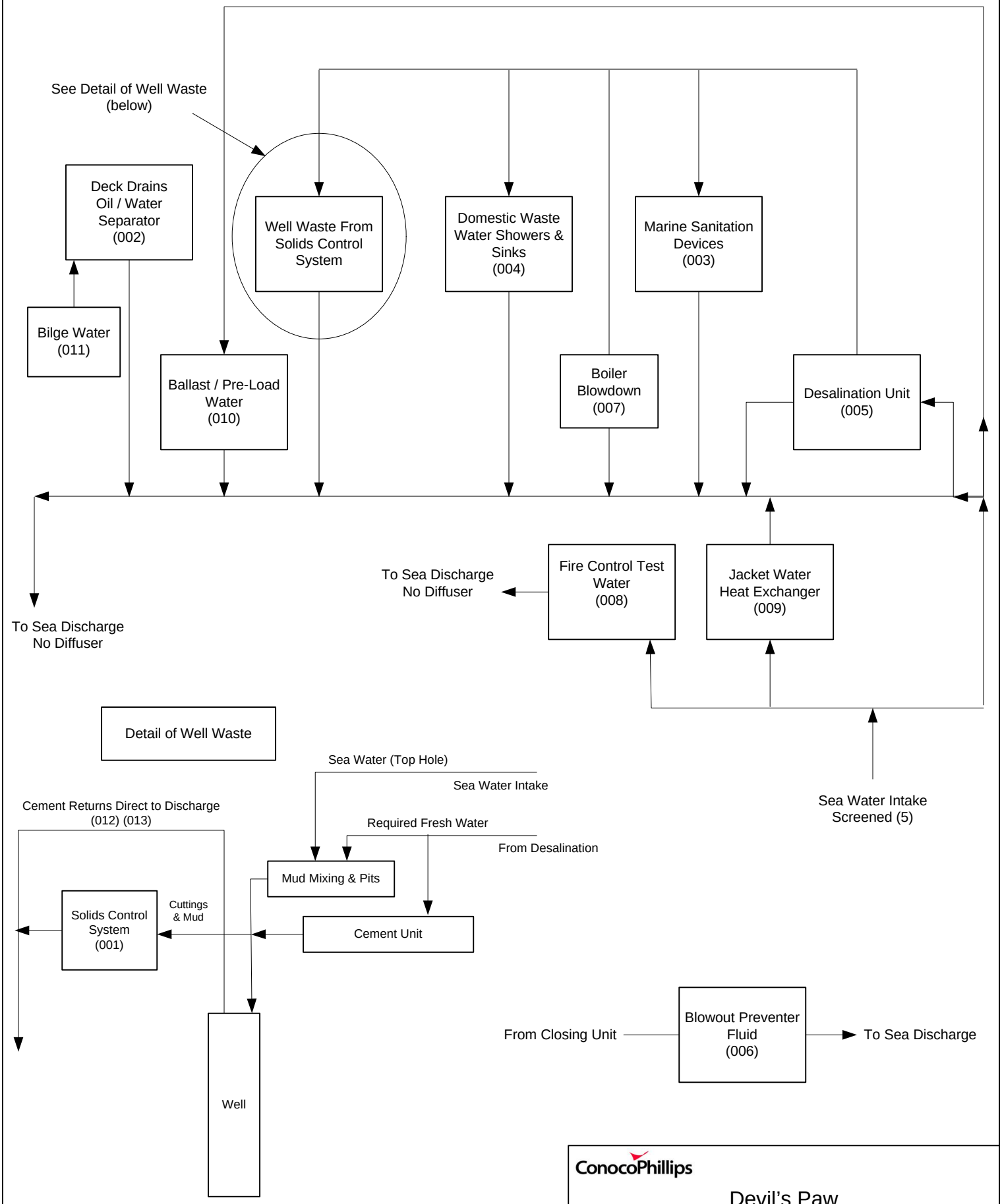
003							
Applicable to both Jack-up Rig or Drill Ship	Sanitary Waste	Effluent from Marine Sanitation Devices (toilets)	4,000 bbls/100-day drill season	40 bbls/day	Historical volumes from similar operations	All sanitary waste from the rig would be treated in USCG approve marine sanitation devices prior to discharge to the ocean.	Added to cooling water discharge stream and discharged through downcomer.
004							
Applicable to both Jack-up Rig or Drill Ship	Domestic Waste	Gray water from showers, galley, etc	11,800 bbls/100-day drill season	118 bbls/day	Historical volumes from similar operations	Domestic wastes (gray water) would be filtered prior to discharge to the ocean.	Discharged to water through overboard line or caisson.
005							
Applicable to both Jack-up Rig or Drill Ship	Desalination Underflow	Sea water with increased salinity	50,000 bbls/100-day drill season	500 bbls/day	Historical volumes from similar operations	The underflow from the desalinization unit would be returned to the cooling water discharge stream and eventually to the ocean.	Discharged to water through overboard line or caisson.
006							
Applicable to Drill Ship with a Subsea BOP Only	BOP Fluid	Water + ≤3% Stack Magic ECO-F additive + ≤25% Stack Glycol (MEG)	42 bbls	7 bbl/day	Equipment specifications.	Discharge subsea at BOP.	Discharge subsea at BOP.
Applicable to Jack-up Rig with an ASID	BOP Fluid	Stack Magic – ECO-F or equivalent	Approximately 5 bbls (per well)	Approximately 38 gal/unit/function	Equipment specifications.	Actuation of the ASID to open would discharge a small volume of Stack Magic ECO-F or its equivalent to the ocean.	Discharged subsea at ASID.
007							
Applicable to both Jack-up Rig or Drill Ship	Boiler Blowdown water	Freshwater containing dissolved and suspended solids	200 bbls /100-day season	2 bbl/d	Historical volumes from similar operations.	Discharge to water through overboard line or caisson. Not stored	Discharge to water through overboard line or caisson.
008							
Applicable to both Jack-up Rig or Drill Ship	Fire Control System Test Water	Seawater	100 bbl/month	100 bbl/month	Historical volumes from similar operations.	Discharged to water through overboard line or caisson.	Discharged to water through overboard line or caisson.

Table 1: ConocoPhillips Devil's Paw Types and Projected Wastes and Volume of Ocean Discharges During the Drilling Season

009							
Drill ship	Non-contact Cooling Water	Seawater	1,665,000 bbls (per well)	48,000 bbls/day	Estimated from previous operations.	Discharged to water through overboard line or caisson.	Discharged to water through overboard line or caisson.
Applicable to Jack-up Rig Only	Non-contact Cooling Water	Seawater	4,520,000 bbls (per well)	113,000 bbls/day	Estimated from previous operations.	Discharged to water through overboard line or caisson.	Discharged to water through overboard line or caisson.
010							
Drill Ship	Uncontaminated Ballast Water	Uncontaminated seawater	21,700 bbls (per well)	620 bbls/day	Estimated from previous operations.	Discharged to water through overboard line or caisson.	Discharged to water through overboard line or caisson.
Applicable to Jack-up Rig Only	Uncontaminated Ballast Water / Pre-load Water	Uncontaminated seawater	33,400 bbls (per well)	33,400 bbls/hr (after preload discharge)	Determined by soil conditions, Underwriters requirement and anticipated variable deck load.	While not truly Ballast water, it is sea water that is taken onboard to increase the weight of the Jack-up Rig to insure its stability, confirm leg penetration and ability to hold anticipated deck load. Tanks are dedicated to take water in order to set the jack-up rig on the seafloor.	Raw sea water is taken onboard, held for approximately 3-4 hrs then immediately returned to the sea surface. Direct discharge from clean Pre-load tanks to ocean.
011							
Applicable to both Jack-up Rig or Drill Ship	Bilge Water	Oily seawater and freshwater	875 bbls (per well)	25 bbls/day	Historical volumes from similar operations.	Treated in oily water separator, uncontaminated water discharged to sea through disposal caisson, oily water stored onboard, transferred for transport by boat to an approved treatment/disposal site.	Discharged to water through overboard line or caisson.

Table 1: ConocoPhillips Devil's Paw Types and Projected Wastes and Volume of Ocean Discharges During the Drilling Season

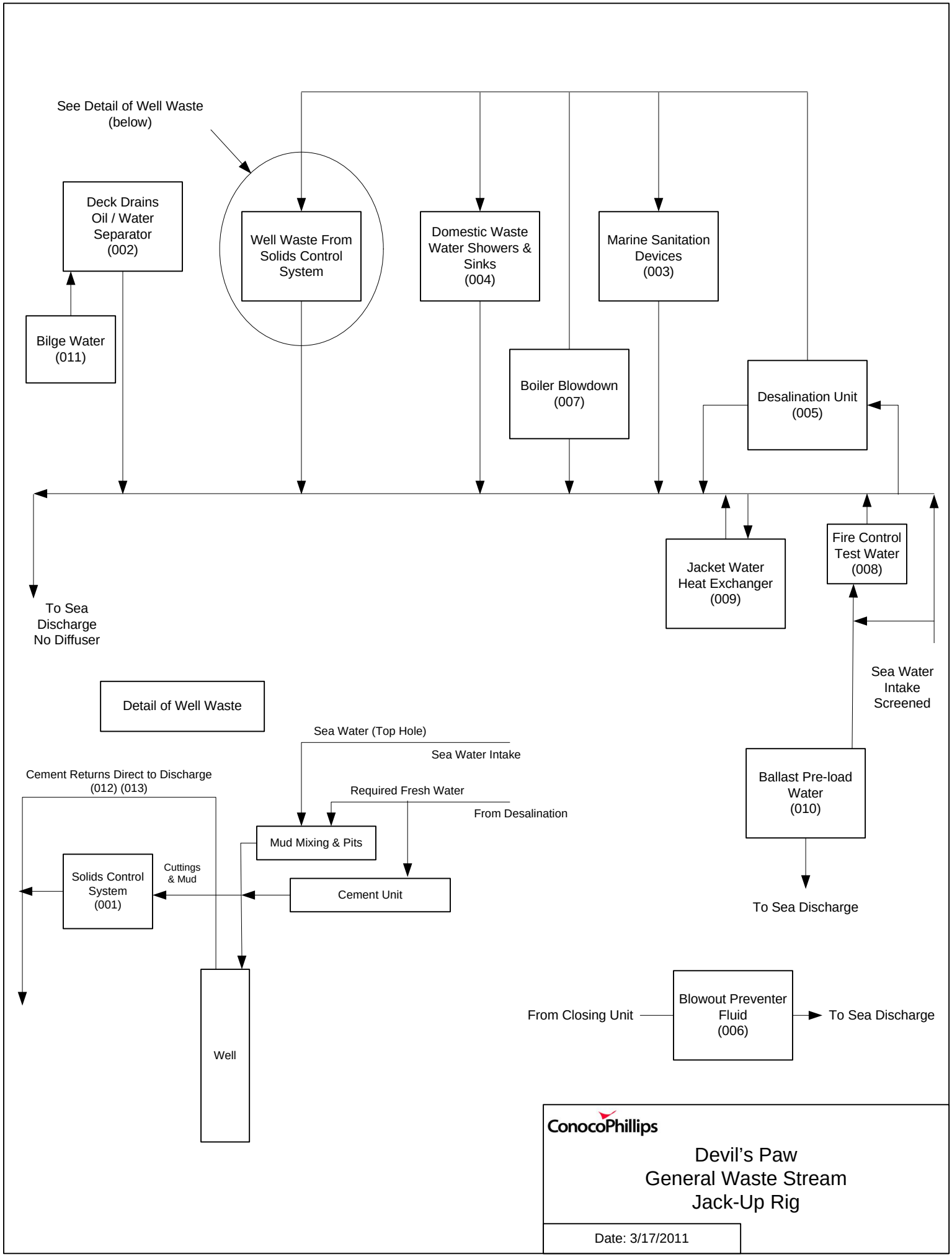
012							
Applicable to both Jack-up Rig or Drill Ship	Excess Cement	Cement, spacers and cement rinsate	800 bbls (per well)	700 bbls/hr	Used empirical washout factors in combination with common excess parameters to insure cement to surface where required. Volume includes rinsate	Excess cement in the structural casing cement job would be returned to the sea floor. Excess cement from the remaining cement jobs would be circulated to the surface and discharged to the ocean. Cement rinsate from all cement jobs would be discharged to the ocean.	Added to cooling water discharge stream and discharged through downcomer.
013							
Drill Ship	Drill cuttings (from MLC and 36-inch section)	Drill cuttings; no drilling muds used	3,310 bbls (per well)	614 bbl/day (for approximately 5 days)	Used empirical expansion and washout factors to convert drilled gage hole size to cuttings volume	Deposited on the surface of the seafloor.	Deposited on the surface of the seafloor.
Applicable Only to Jack-up Rig without Mud Line Cellar	Drill cuttings generated from seafloor to +/- 300' below the seafloor	Drilled rock/ bentonite	2,030 bbls (per well)	Approximately 400 bbls/hr	Used empirical expansion and washout factors to convert drilled gage hole size to cuttings volume	The cuttings from this top hole section will not be treated, stored or disposed of downhole. They will be circulated up using seawater with Gel sweeps and deposited on the sea floor.	Direct to sea floor as produced.
Applicable to Jack-up Rig with Mud Line Cellar Only	Drill cuttings from Mud Line Cellar including 42" top hole section	Drilled rock/ bentonite	3,120 bbls (per well)	400 bbls/hr to 600 bbls/hr	Used empirical expansion and washout factors to convert drilled gage hole size to cuttings volume	The cuttings from this top hole section will not be treated, stored or disposed of downhole. They will be circulated up using seawater with Gel sweeps and deposited on the sea floor.	Direct to sea floor as produced.
Applicable to both Jack-up Rig or Drill Ship	Mud, cuttings, cement at seafloor	Mud, cuttings, cement spacers, cement rinseate	290 bbls (per well)	700 bbls/hr max.	Historical volumes from similar operations.	Not stored, discharged to seafloor.	Discharge to water through overboard line



ConocoPhillips

Devil's Paw
General Waste Stream
Drill Ship

Date: 3/17/2011


See Detail of Well Waste (below)
Deck Drains Oil / Water Separator (002)
Well Waste From Solids Control System
Domestic Waste Water Showers & Sinks (004)
Marine Sanitation Devices (003)
Bilge Water (011)
Boiler Blowdown (007)
Desalination Unit (005)
To Sea Discharge No Diffuser
Jacket Water Heat Exchanger (009)
Fire Control Test Water (008)
Sea Water Intake Screened
Detail of Well Waste
Sea Water (Top Hole)
Sea Water Intake
Cement Returns Direct to Discharge (012) (013)
Required Fresh Water
From Desalination
Ballast Pre-load Water (010)
Mud Mixing & Pits
Solids Control System (001)
Cuttings & Mud
Cement Unit
To Sea Discharge
Well
From Closing Unit
Blowout Preventer Fluid (006)
To Sea Discharge
ConocoPhillips
Devil's Paw
General Waste Stream
Jack-Up Rig
Date: 3/17/2011

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF THE
REGIONAL
ADMINISTRATOR

JUN 23 2011

Mr. Bruce St. Pierre, Jr.
Senior Environmental Coordinator
ConocoPhillips Alaska, Inc.
700 G Street, ATO 1966
P.O. Box 100360
Anchorage, Alaska 99510-0360

RE: Coverage for ConocoPhillips Alaska, Inc. under the National Pollutant Discharge Elimination System (NPDES) General Permit for Oil and Gas Exploration Activities on the Outer Continental Shelf and Contiguous State Waters for Discharges into the Chukchi Sea, Alaska

Dear Mr. St. Pierre:

On April 5, 2011, the U.S. Environmental Protection Agency (EPA) received six (6) Notices of Intent (NOIs) from ConocoPhillips Alaska, Inc., (COP) for authorization to discharge into the Chukchi Sea. Specifically, the NOIs requested permit coverage under the NPDES General Permit, AKG-28-0000 (Arctic GP), for wastewater discharges from COP's proposed exploration activities beginning in the 2013 drilling season in the Chukchi Sea. The six NOIs were for drilling locations in the COP Devil's Paw prospect area.

The EPA staff requested additional information from COP during NOI review. The EPA received supplemental information on April 14, 2011, which included five (5) revised NOIs, a regional map, a discharge listing table and flow diagrams. COP removed the previously submitted NOI for the Colbert Area Block No. 6122 in its April 14, 2011 submittal.

Pursuant to 40 C.F.R. § 122.21(d)(2) and Part VI.B of the Arctic GP, the NOIs should have been submitted at least 180 days before the June 26, 2011 expiration date of the Arctic GP. The EPA may grant permission to submit NOIs later than the 180-day deadline, but not later than the permit expiration date. Pursuant to 40 C.F.R. § 122.21(d)(2)(i), the EPA hereby grants COP permission to submit the five NOIs after the 180 day deadline and accepts submittal of your NOIs. In addition, the NOIs are deemed complete.

Pursuant to Part I.D.3 of the Arctic GP, COP is authorized the following discharges into the Chukchi Sea from the five proposed drill sites summarized in Table 1, below, subject to the terms and conditions of the Arctic GP:

Discharge Number	***Discharge Description***
001	Drilling Fluids and Drilling Cuttings
002	Deck Drainage
003	Sanitary Wastes
004	Domestic Wastes

005	Desalination Unit Wastes
006	Blowout Preventer Fluid
007	Boiler Blowdown
008	Fire Control System Test Water
009	Non-contact Cooling Water
010	Uncontaminated Ballast Water
011	Bilge Water
012	Excess Cement Slurry
013	Muds, Cuttings, Cement at Seafloor

Table 1 also includes the NPDES permit number assigned to each of the five proposed drill sites. Please use the applicable NPDES permit numbers in all future correspondence and reports.

Table 1

Permit Number	Lease Block	Well Name
AKG-28-0036	6123	Devil's Paw 1
AKG-28-0037	6074	Devil's Paw 2
AKG-28-0038	6023	Devil's Paw 3
AKG-28-0039	6220	Devil's Paw 4
AKG-28-0040	6073	Devil's Paw 5

Please note the effluent limitations and monitoring requirements in Part II and the monitoring, recording and reporting requirements in Part III of the Arctic GP. Discharge Monitoring Reports must be submitted monthly by the 10th day of the following month.

A copy of the Arctic GP is enclosed and is also available on the EPA's webpage at http://yosemite.epa.gov/r10/water.nsf/npdes+permits/arctic-gp . Facilities discharging under the authority of the Arctic GP must keep a copy of the permit and this coverage letter at the facility where the discharges occur, or retain a copy at the nearest administrative or field office managing the operation.

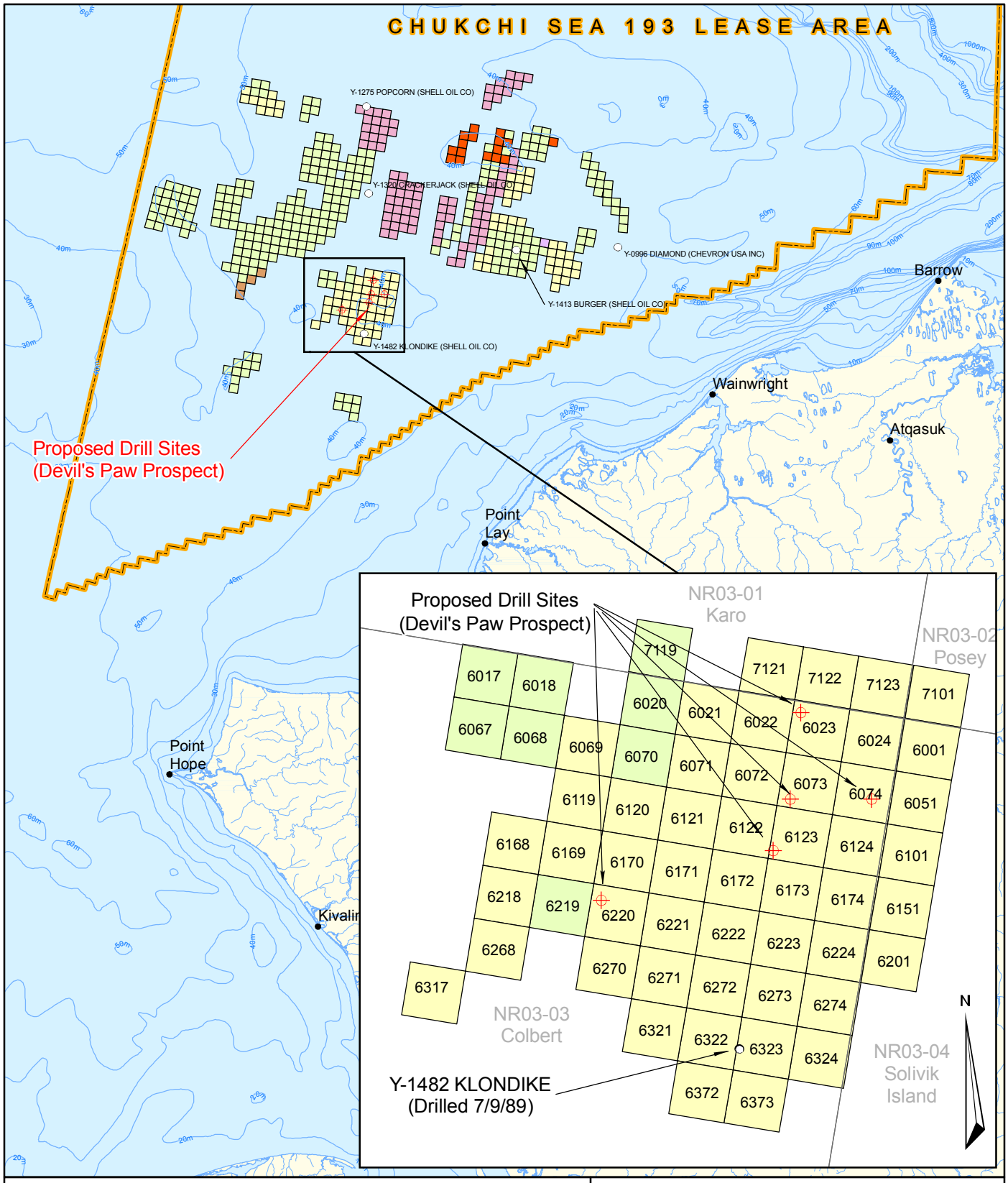
The EPA is in the process of reissuing the Arctic GP as two separate exploration general permits for the Beaufort and Chukchi Seas. Permit coverage under the Arctic GP will expire when coverage under the reissued general permits is in effect. Operators authorized to discharge under the Arctic GP will be required to submit new NOIs for continued permit coverage under the applicable general permits when they are reissued.

If you have any questions regarding this coverage letter or the Arctic GP, please do not hesitate to contact Hanh Shaw, NPDES Permits Unit, at shaw.hanh@epa.gov or (206) 553-0171.

Sincerely,

Dennis J. McLerran for
Regional Administrator

Enclosure


CHUKCHI SEA 193 LEASE AREA
Y-1275 POPCORN (SHELL OIL CO)
Y-1320 CRACKERJACK (SHELL OIL CO)
Y-0996 DIAMOND (CHEVRON USA INC)
Y-1413 BURGER (SHELL OIL CO)
Y-1482 KLONDIKE (SHELL OIL CO)
Barrow
Wainwright
Atqasuk
Point Lay
Point Hope
Kivalina
Proposed Drill Sites (Devil's Paw Prospect)
Proposed Drill Sites (Devil's Paw Prospect)
NR03-01 Karo
NR03-02 Posey
NR03-03 Colbert
NR03-04 Solivik Island
7119
7121
7122
7123
7101
6017
6018
6020
6021
6022
6023
6024
6001
6067
6068
6069
6070
6071
6072
6073
6074
6051
6119
6120
6121
6122
6123
6124
6101
6168
6169
6170
6171
6172
6173
6174
6151
6218
6219
6220
6221
6222
6223
6224
6201
6268
6270
6271
6272
6273
6274
6317
6321
6322
6323
6324
6372
6373
Y-1482 KLONDIKE (Drilled 7/9/89)
N
Alaska Albers Equal Area Conic, NAD83
Devil's Paw Drill Location
Historic OCS Wells
Sale 193 Boundary
Bathymetry (m)
CPAI
ENI
IONA
NACR
REPSOL
SHELL
STATHYDRO
DRAFT
DRILL LOCATION SITE & LEASE BLOCKS
ConocoPhillips
SCALE: 0 12.5 25 50 Miles
0 15 30 60 Km
FIGURE: 1
ARCADIS:CPAI0006, 6/10/10, R02